

REMARKS

The invention, among other things, includes the use of a collective internal representation of received documents. For example, in one embodiment of the invention, a system, as it processes a document, adds data representing that document to a set of data structures that include data representing other documents, if any, being processed by the system. Such a system may allow, for example, for the compaction of redundant data among multiple documents, thereby reducing the amount of memory required for storing the documents. Such a system also provides for flexible manipulation and display of the stored documents.

Applicant adds claims 43–53, amends claims 1-3, 5, 8, 14, 26, 29-34, 40-41, and cancels claims 4, 6-7, 11-13, 15-18, 20-21, 23-25, 27-28, and 35-39 without prejudice or disclaimer. No new matter is added. Applicant traverses the rejections and requests reconsideration in light of the above amendments and the following remarks. Applicant acknowledges and appreciates the withdrawal of the objections to Figure 2 and claim 40.

Claims 1, 43, 50, and 51 Are Patentable Over Alam and Meltzer:

Claim 1 is rejected over U.S. Patent No. 6,336,124 to Alam et al (“*Alam*”). Claim 1 previously recited “internal representation data representing the collective content of the bytestreams.” The Action asserts that *Alam* discloses “collective content” because “all content” included in a given input document converted by an Alam-based system is later included in the internal version of the document that the system generates. See ¶ 2. Based on a similar rationale, in its rejection of now cancelled claim 24, the Action asserts that U.S. Patent No. 6,125,391 to Meltzer et al. (“*Meltzer*”) also discloses “collective content.” See ¶ 10. However, in contrast to any internal representation disclosed in *Alam* or *Meltzer*, amended claim 1 more particularly points out that a collective internal representation includes content from multiple documents, not just one.

Specifically, the claim recites “storing said converted first set of document objects in an internal representation,” and “adding [a] converted second set of converted document objects to the stored internal representation, thereby creating a collective internal representation including content from each of the first and second bytestreams.” Each bytestream corresponds to “a separate, independent document.”

Alam describes a document translation system that converts a document having an input format (e.g., PDF, RTF, HTML, XML, TIFF, etc.) into a second format referred to as the output format. Col. 1, ln. 60–Col. 2, ln. 11. The translation includes the conversion of the document from the input format into a plurality of intermediate format blocks. Col. 2, lns. 14–18. The intermediate format blocks are then converted and output from the system in an output format. *Alam* fails to teach or suggest adding intermediate format blocks from a second document to an internal representation that already includes intermediate format blocks from a first document. Thus, *Alam* fails to teach or suggest the subject matter of claim 1.

Meltzer describes a system that receives XML documents in a first format at a network interface (step 400), converts the documents into a host format (step 403), such as a collection of JAVA objects. The system then converts the JAVA objects into an output format (step 406), such as XML. *Meltzer* fails to teach or suggest adding JAVA objects from a second input document to an internal representation that already includes JAVA objects originating from a first input document. Thus, *Meltzer* also fails to teach or suggest the subject matter of claim 1.

Harrington and *Rivette* fail to cure the deficiencies of *Alam* and *Meltzer*.

Applicant therefore requests reconsideration and withdrawal of the pending §102 rejection of claim 1. Rejected claims 2, 3, 5, 8–10, 14, 19, 22 depend from claim 1, directly or indirectly, and add further limitations, thereto. Applicant therefore requests reconsideration and withdrawal of any §102 and/or §103 rejections of these claims. New claim 53 also depends from claim 1 and adds additional limitations thereto. Thus, Applicant requests that claim 53 be passed on to allowance.

New claims 43, 50, and 51 include limitations similar to those discussed above with respect to claim 1, and thus are likewise patentably distinguishable over the cited references. Claims 26, 29–34, 40, and 44–49 depend from claim 43 directly or indirectly, and add further limitations thereto. Applicant requests reconsideration and withdrawal of any §102 and/or §103 rejections to claims 26, 29–34, and claim 40, and that these claims, as well as claims 44–49, be passed on to allowance. Claim 52 depends upon claim 51 and adds additional limitations, thereto. Thus, Applicant requests this claim be passed on to allowance.

Claim 41 Is Patentable Over the Cited References

Claim 41 also relates to the aggregation of content from a plurality of documents into a collective internal representation of the documents. Specifically, claim 41 recites “converting content in each of [a] plurality of digital documents into a collective set of document objects including internal representations of primitive structures identified in each of the digital documents.” As described above, neither *Alam* nor *Rivette* describes a set of document objects that includes primitive structures from more than one document. Therefore, claim 41 is patentable over *Alam* and *Rivette*. Claim 42 depends from claim 41 and adds further limitations thereto. Applicant therefore requests reconsideration and withdrawal of the §103 rejections of claims 41 and 42.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response other than as reflected on the enclosed Amendment Transmittal. However, if a fee is due, please charge our Deposit Account No. 18-1945, under Order No. PGLD-P01-007 from which the undersigned is authorized to draw.

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Respectfully submitted,

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